

VIII. Certification and Eligibility and Coordination of Services

8.1.130 Income Assessment and Documentation

Authority 2019 7 CFR 246.4(a)(6); 246.7(d) & (h); WIC Policy Memo 2013-3; WIC Policy Memo 2003-3; WIC Policy Memo 99-4

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DEFINITIONS:

Income: Current income is defined as income received by the household during the 30-day period prior to the date of the application for WIC benefits.

Household: For the purpose of determining household income, household refers to a person or number of persons who usually live together (although not necessarily) and share economic resources and consumption of goods or services.

POLICY: The local agency (LA) shall assess income or adjunct eligibility of all applicants at each certification based on household size and income. For household size determination, refer to [8.1.140](#).

A temporary certification may be issued for up to 30 days and up to 30 days' worth of benefits may be provided if income documentation is not available. There are no exceptions to the 30-day limit. Temporary certification is not permitted if either proof of residency or identity is also missing, except as authorized due to disaster or emergency situations. Refer to policy [4.1.060](#).

The LA shall reassess and verify WIC participant income eligibility during the current certification period if the LA receives information indicating that the household income has changed.

At the time of reassessment, if one (1) household member is determined to be ineligible based on income and terminated from the program, all other participants in that household are ineligible based on income. Therefore, all participating family members must be terminated from the program, unless adjunct eligibility applies for one or more individuals.

PROCEDURES:

A. Proof of Eligibility

1. The LA must inform the applicant or participant of the need for proof of income for the household when scheduling a certification appointment.
2. The type of document viewed to provide proof of eligibility must be identified in the income calculator screen of the Missouri WIC Information Network System (MOWINS).
3. The LA may require verification of information which it determines necessary to confirm income eligibility for WIC benefits. Verification involves the LA actively obtaining proof from a reliable third party that the documentation presented by the applicant is correct.

4. If an applicant, participant, parent, or guardian (not adjunctively eligible) fails to present proof of income at the certification appointment, the agency shall choose one option below:
 - a. Inform the applicant, participant, parent, or guardian of the required documents needed and schedule a new certification appointment within regulatory time frames, or
 - b. If all other eligibility requirements are met, and identity and residency proofs have been provided:
 - i. The applicant, participant, parent, or guardian must self-declare income.
 - ii. The applicant must be notified of the self-declaration statement in the WIC Participant's Rights and Responsibilities.
 - iii. The LA shall mark the pending proof of income box in MOWINS and provide food benefits for only the current month's food package.
 - iv. The LA shall schedule the participant to return with the required proof of income within 30 days or at the next available clinic day.
 - v. The LA shall issue no more than 30 days' worth of food benefits with pending proof.

B. Adjunct Eligibility

1. Adjunct eligibility may be proven with the following:
 - a. HDFS screen showing current eligibility in MO HealthNet, Food Stamps, or TANF.
 - b. Letter of current eligibility for MO HealthNet showing name of applicant or participating family member(s). A MO HealthNet card is not acceptable proof of current eligibility.
 Note: MO HealthNet co-pay programs for persons over 185% of poverty or Show-Me Healthy Babies (SMHB) do not qualify for adjunct eligibility.
 - c. Temporary Assistance letter showing current eligibility.
 - d. Food Stamp Program letter showing current eligibility. Note: A Food Stamp EBT card is not acceptable proof of current eligibility.
2. An adjunctively eligible individual shall self-declare their household income. Adjunct eligibility overrides the actual income. Select "Self Declaration" in the drop-down box in MOWINS.
3. An adjunctively eligible foster child does not confer eligibility to other household members since a foster child is considered a household of one.
4. An individual providing valid proof of adjunct eligibility is not subject to further income assessment.

C. Determining Income

1. Income is gross monetary income before any deductions including income taxes, employee's social security taxes, insurance premiums, retirement, and any other deductions, such as bonds or garnishments.
2. No deductions from income are allowed, regardless of expenses or hardship.
3. The following shall be used to determine if current or annual income is the best indicator of eligibility for each applicant or participant:
 - a. Current income is income received in the 30-day period prior to the application.
 - b. If income is being assessed prospectively (e.g., the sole support of that family has just been laid off, but has been authorized to receive unemployment benefits for the next six (6) months), current income refers to income that will be available to the family in the next 30 days.
 - c. Annual income is income received in the most recent 12 months prior to the date of application. Some examples of when annual income might be more appropriate include:
 - i. Those who work irregular times or seasonally.
 - ii. Those on temporary leaves of absence.
 - iii. Teachers paid on a 10-month basis.
 - iv. Self-employed individuals.
 - v. Families of military and military reservists (e.g., reenlistment bonuses, hazardous duty pay).
4. Zero income reported by applicant:
 - a. All applicants declaring zero income (except participants that are adjunctively eligible) must be asked for information as to how they obtain food, shelter, clothing, and medical care. The participant or guardian must complete and sign the [Affidavit of Zero Income](#).
 - i. Select 'Affidavit' from the income drop-down menu in MOWINS.
 - ii. Scan and save the signed Affidavit of Zero Income in the participant folder in MOWINS.
5. The type of document viewed to provide proof of income must be noted electronically in MOWINS. Examples of acceptable documentation may include:
 - a. Current pay stub noting the pay time frame (e.g., weekly, bi-weekly, monthly).
 - b. Signed statement from employer indicating gross earnings for a specified pay period.
 - c. Commissions, fees, and tip records.

- d. W-2 forms or income tax returns for the most recent calendar year.
- e. Unemployment letter or notice.
- f. Check stub or award letter from Social Security stating current amount of income.
- g. Recent Leave and Earnings Statement (LES) for military personnel.
- h. Recent bank statement.
- i. Foster child placement letter or foster parent award letter.
- j. Divorce decree which states alimony and/or child support.
- k. Scholarship letter.
- l. Accounting records for the self-employed.
- m. Other source of income not listed above must be documented in the general notes in the participant folder in MOWINS.

D. Reassessing Income Eligibility

1. Do not reassess income within a certification period unless the LA becomes aware of a change in household income that would affect eligibility status. However, reassessment of income eligibility is not required in cases where only 90 days or less remains before the expiration of the benefit period.
 - a. If the participant is found to be income eligible, the participant will remain on the program until the end of the certification period.
 - b. If the participant is found to be no longer income eligible, the LA shall provide a 15-day advance written notice of termination of certification and appeal rights. Participation of any other household members on WIC must be terminated as well.
2. If the LA receives a documented complaint regarding the income reported at the time of assessment, follow-up should occur to determine if the participant gave accurate information at the assessment. The LA is required to follow up on an anonymous complaint.
3. If custody of an infant or child changes during a certification period, the income must be reassessed. If an infant or child is found to be no longer income eligible, the LA shall provide a 15-day advance written notice of termination of certification and appeal rights. Participation of any other members in the same household must be terminated as well.
 - a. If there is a custody dispute, the infant or child is counted in the household of the guardian on record. The person disputing the guardianship must supply documentation to the agency to verify a change in guardianship.
 - b. The child shall be placed on monthly issuance until the custody dispute is resolved.

E. Income Inclusions - The LA shall count the following as income:

1. Monetary compensation for services, including wages or salary, commissions, fees, tips, and training stipends.
 2. Net income (gross receipts less operating expenses) from farming self-employment, non-farming self-employment, rental property, and royalties.
 3. Social Security benefits.
 4. Public assistance, private assistance, or financial support payments.
 5. Unemployment compensation.
 6. Strike benefits.
 7. Worker's compensation.
 8. Pensions, retirement pay, or annuities from government, military, or veteran's agencies, and private companies.
 9. Alimony received.
 10. Child support received.
 11. Dividends or interest received.
 12. Income received or withdrawn from estates or trust accounts.
 13. Regular contributions from persons not living in the household, such as parental assistance to students.
 14. Monetary prizes.
 15. Withdrawal from savings or investments.
 16. Student financial assistance (except those listed in section F.7.).
 17. Loans that do not need to be repaid.
 18. Capital gains.
 19. Lump sum payments that are not reimbursements for lost assets or injuries (e.g., gifts, inheritance, lottery winnings, winnings and proceeds from gaming, gambling, bingo, and severance pay). Count these as annual income, not current monthly income.
 20. Income from work as a census worker or election official.
- F. Income Exclusions - The LA shall not count as income the following:
1. The value of in-kind housing or other non-monetary benefits and bartered service.
 2. Federal and state tax refunds, Earned Income Tax Credit (EITC), and rebates.
 3. Gifts periodically given.
 4. Loans, not including amounts to which the applicant has constant or unlimited access.
 5. Reimbursements for expenses incurred (e.g., business expenses and medical bills).

6. Lump sum payments or large cash settlements received by the household as reimbursements for lost assets or injuries.
7. Student financial assistance that meets all of the following criteria:
 - a. Used to pay for costs of attending the institution at least halftime, but not for room and board or dependent care. Institutional attendance costs include tuition and fees, books and supplies, transportation, and miscellaneous personal expenses for the student.
 - b. Provided through any of the following under Title IV of the Higher Education Act of 1965:
 - Pell Grants.
 - Supplemental Educational Opportunity Grant.
 - Stafford Loans.
 - Perkins Loans.
 - PLUS loans/supplemental loans for students.
 - College work study.
 - Byrd Honor Scholarship programs.
8. Volunteer payments through:
 - a. Title I (Volunteers in Service to America (VISTA) and others) and Title II (Retired Senior Volunteer Program (RSVP), foster grandparents, and others) of the Domestic Volunteer Service Act of 1973.
 - b. Section 8(b)(1)(B) of the Small Business Act (Service Corps of Retired Executives (SCORE) and Active Corps of Executives (ACE)).
9. Payments through:
 - a. Migrant and seasonal farm workers program.
 - b. Veterans employment programs.
 - c. Job Corps.
 - d. Housing and Urban Development (HUD) rent subsidies.
 - e. The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended in 1987. This is for persons displaced from their homes by federal or state projects.
 - f. The Civil Liberties Act of 1988 (Japanese internment camps).
 - g. Dislocated worker programs.
 - h. The prescription drug discount card program.
 - i. Payments received by property owners under the National Flood Insurance Program (NFIP) for flood mitigation activities.
 - j. Filipino Veterans Equity Compensation Fund payments.

10. Cash stipend from the Division of Developmental Disabilities for purchasing goods and services for a family member with a developmental disability.
11. The value of assistance to children or their families under the:
 - a. National School Lunch Act.
 - b. Child Nutrition Act of 1966.
 - c. Food and Nutrition Act of 2008.
12. Benefits received through childcare grant programs under:
 - a. Section 402(g)(1)(E) of the Social Security Act, as amended by the Family Support Act.
 - b. Child Care and Development Block Grant Act.

G. Military

1. Income inclusions for military:
 - a. Military housing allowance, if assigned to a high cost of living area in the continental United States (Continental United States Cost-Of-Living Allowance or CONUS COLA).
 - b. Basic Allowance for Subsistence (BAS) pay for military families.
 - c. Income for military members from Deployment Extension Incentive Pay (DEIP)/Deployment Extension Stabilization Program (DESP) is included when the service member is serving at their home station in the United States. See 2.d.
 - d. Combat pay received by the service member prior to his or her deployment to or service in the designated combat zone.
2. Income exclusions for military:
 - a. Housing allowances for military service personnel:
 - i. The basic allowance for housing (BAH) received by military families living in the United States. This includes payments for both off-base housing and for privatized on-base housing.
 - ii. Family separation housing (FSH) provided to military personnel in overseas housing with military families continuing to receive BAH in the United States.
 - iii. Overseas housing allowance (OHA) provided to military personnel living overseas.
 - b. The cost of living allowance the family receives when the military member is assigned and lives overseas, but the family (participant) lives within the United States. This is referred to as Overseas Continental United States Cost-Of-Living Allowance (OCONUS COLA).

- c. Combat pay received by military service personnel during a deployment if:
 - i. Received in addition to the service member's basic pay.
 - ii. Received as a result of the service member's deployment to or service in an area that has been designated as a combat zone.
 - iii. There are two categories of entitlement that are typically considered to be combat pay and are easily recognizable on the service member's Leave and Earning Statement (LES): Hostile Fire Pay/Imminent Danger Pay (HFP/IDP) and Hardship Duty Pay (HDP). However, other types of pay could be excluded if they meet the criteria above in i, ii, and iii
- d. Income for military members from Deployment Extension Incentive Pay (DEIP)/Deployment Extension Stabilization Program (DESP) while the service member is deployed overseas is to be excluded from the income assessment.
- e. Family Subsistence Supplemental Allowance (FSSA) payments provided by Department of Defense to low-income members of the Armed Forces.

H. Special circumstances:

- 1. Foster child: If the Children's Division or another agency is legally responsible for a child, only payments the foster family receives for the care of the child shall be considered income.
- 2. In-stream migrant farm workers:
 - a. Must have eligibility determined at least once every 12 months.
 - b. If the verification of certification (VOC) document shows that income has been determined in the last twelve months, no other income determination will be done, even if the VOC document has expired.
- 3. Self-employed applicants showing no profit, or showing a loss, are treated as zero income.

- I. Exception: The proof of income documentation requirement does not apply to individuals for whom the necessary documentation is not available and the requirement presents an unreasonable barrier to participation (e.g., homeless woman or child, migrant farmworker) and for whom the agency determines the income documentation requirement could not be obtained. Refer to [2.4.090](#) and [4.1.060](#). The LA must require the applicant to sign a statement specifying the income received the 30 days prior to the certification and why he or she cannot provide proof of income. Scan the signed statement and save in the participant folder in MOWINS.